

**FILED**

**SEP 21 2000**

**PEGGY B. DEANS, CLERK  
U.S. BANKRUPTCY COURT  
EASTERN DISTRICT OF N.C.**

**UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
RALEIGH DIVISION**

IN RE:	)	
	)	
INTERNATIONAL HERITAGE, INC.	)	CHAPTER 7
	)	CASE NO. 98-02675-5-ATS
	)	
INTERNATIONAL HERITAGE,	)	CHAPTER 7
INCORPORATED,	)	CASE NO. 98-02674-5-ATS
	)	
Debtors.	)	

**INTERIM APPLICATION FOR SPECIAL ATTORNEY  
FOR TRUSTEE FEE AND EXPENSE REIMBURSEMENT**

The undersigned Stephani W. Humrickhouse of Nicholls & Crampton, P.A. ("Applicant") applies to the Court for the entry of an Order approving and authorizing interim Special Attorney for Trustee's fees for the period September 9, 1999, to August 23, 2000, in the amount of \$2,972.50, and expense reimbursement in the amount of \$186.10. In support of said Interim Application, Applicant respectfully shows the Court the following:

1. Applicant has acted as Special Attorney for the Trustee since employed and appointed by Order dated January 28, 1999. The services rendered by Applicant and members of its firm have been substantial and Applicant believes that allowance of a fee in full at this time is appropriate and necessary. Members of the firm have rendered valuable services regarding the evaluation of avoidance actions and negotiation of settlement of certain litigation.

2. A Summary of Services Rendered which indicates the name of the attorney or paralegal, the hours spent, the hourly rate and total compensation requested is attached as Exhibit A. Attached as Exhibit B is a breakdown by hours and description of the services rendered in connection with this Application. Services rendered were reasonable and necessary in the proper representation of the Debtor. Said Exhibit B reflects an itemization of expenses incurred on behalf of the Debtor by category totals.

3. The Trustee's agreement to pay the fees at the rates set out herein are substantiated in its Application by Trustee for Authority to Employ and Appoint Attorney Specially dated January 27, 1999. Stephani W. Humrickhouse has rendered professional services of not less than 20.50 hours and that for such professional services Trustee agreed to pay the rate of \$145.00 per hour.

4. Stephani W. Humrickhouse is a Partner with Nicholls & Crampton, P.A. She is a Board Certified Specialist in Bankruptcy Law by the North Carolina State Bar Board of Legal Specialization, is a former member of the Bankruptcy Council of the North Carolina Bar Association, previously served as Chairman of its Continuing Legal Education Committee, is a Certified Bankruptcy Specialist by the American Bankruptcy Certification Board and is an experienced Chapter 11 bankruptcy practitioner. Humrickhouse was admitted to the bar in 1980. Humrickhouse regularly charged and has been paid as her ordinary rate during the time period covered by this Application the amount of at least \$145.00 per hour.

7. Copying charges are recorded by client identification number, pursuant to a control counting device connected to Applicant's copying machine. The copying charges are read by Applicant's Office Administrator twice monthly, at mid and end month, and entered into the Accounting Package on those "read" dates. Applicant does not have the ability to further break down the dates such copying charges were incurred other than as expressed above.

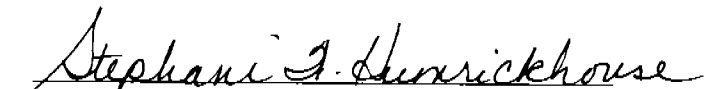
8. Postage charges for are entered cumulatively at month's end.

9. Copies are charged at 20¢ per page, and fax transmissions are charged at \$1.00 per page for out-going transmissions, with no charge for incoming faxes. Deliveries are charged at the rate of \$7.50. Mileage reimbursement was made at the rate of 31¢ per mile.

10. The best interests of Trustee, the Debtor, and the Estates will be served by the allowance of this Application in full.

WHEREFORE, Applicant respectfully requests the Court for the entry of an Order allowing and authorizing Special Attorney for Trustee fees in the amount of \$2,972.50, and expense reimbursement in the amount of \$186.10.

This the 30 day of August, 2000.

  
Stephani W. Humrickhouse  
State Bar No. 9528  
Attorney for Trustee  
Nicholls & Crampton, P.A.  
Post Office Box 18237  
Raleigh, NC 27619  
Telephone: 919/781-1311

CERTIFICATE OF SERVICE

It is hereby certified that the foregoing **INTERIM APPLICATION FOR SPECIAL ATTORNEY FOR TRUSTEE FEE AND EXPENSE REIMBURSEMENT** was served this day by placing a copy thereof in a depository under the exclusive care and custody of the United States Postal Service in a postage prepaid envelope and properly addressed as follows:

Mrs. Marjorie K. Lynch  
Bankruptcy Administrator  
P. O. Box 3758  
Wilson, NC 27895-3758

This the 21<sup>st</sup> day of September, ~~August~~ 2000.

Jerry D. Johnson, Paralegal

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NORTH CAROLINA  
RALEIGH DIVISION

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INTERNATIONAL HERITAGE, INC.	)	CASE NO. 98-02675-5-ATS
	)	
INTERNATIONAL HERITAGE,	)	CHAPTER 7
INCORPORATED,	)	CASE NO. 98-02674-5-ATS
	)	
Debtors.	)	

**SUMMARY OF SERVICES RENDERED**

Nicholls & Crampton, P.A.

From September 9, 1999 through August 23, 2000, the undersigned person/firm has performed professional services for this estate in the capacity of attorney for the Trustee during the Chapter 7 case. Attached hereto is an itemization of time expended and expenses incurred in the performance of these professional services.

<u>NAME</u>	<u>TITLE</u>	<u>HOURS SPENT</u>	<u>HOURLY RATE</u>	<u>TOTAL</u>
Stephani W. Humrickhouse	Partner	20.50	\$145.00	\$ 2,972.50

TOTAL FEES \$ 2,972.50

TOTAL EXPENSES \$ 186.10

TOTAL AMOUNT REQUESTED \$ 3,158.60

In Account With  
**NICHOLLS & CRAMPTON, P.A.**  
ATTORNEYS AT LAW

4300 Six Forks Road—Suite 700  
Post Office Box 18237  
Raleigh, North Carolina 27619

Telephone: 919/781-1311 Fax: 919/782-0465

Federal ID #  
56-1201204

02/03/00

Invoice 30595

TO **Holmes P. Harden**  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-001 SH/G - International Heritage, Inc - Chapter 7  
Amount Paid: \_\_\_\_\_

Return Upper Portion With Payment

For legal services rendered, including  
but not limited to

09/09/99	HUM	Conference with Craig Adams re: preference analysis	.50
09/29/99	HUM	Letter to Craig Adams re: insider list and preference analysis	.50
10/11/99	HUM	Review information re: Jewels by Evonne	.50
10/18/99	HUM	Extended conference with Craig Adams re: preference analysis	.40
10/26/99	HUM	Research and draft adversary proceeding re: Mayflower Companies and Van Etten (2.3); Review objection to Acstar to settlement of Executive Risk (.4); Call to Harden (.4)	3.10
10/27/99	HUM	Finalize adversary proceedings re: Van Etten lien avoidance, transmit draft to Trustee re: approval	.80
10/28/99	HUM	Call to Holmes Harden re: Van Etten APs (.2); Evaluate Acstar objection to Executive Risk Settlement (.5)	.70
11/01/99	HUM	Finalize APs against Van Etten and Mayflower Companies, letter to Wood re: acceptance of service of	.80

A finance charge is computed on account balances unpaid 30 days after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With

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APs

11/02/99	HUM	Review Voluntary Dismissal for Van Etten	.20
11/04/99	HUM	Review Trustees objection to Acstar claim	.30
11/08/99	HUM	Call to Jim Roberts re: hearing on Acstar claim (.5)	.50
12/01/99	HUM	Call to Jim Johnson re: Acstar Litigation and preparation therefore	1.50
12/02/99	HUM	Hearing on Trustee objection to Acstar claim (2.0); Draft consent judgment re: Van Etten avoidance AP (1.0); Transmit draft to Harden for comment (.2)	3.20
12/03/99	HUM	Transmit consent judgments with cover letter to Brent Wood	.30
12/16/99	HUM	Call to Brent Wood re: consent orders in AP	.30
12/17/99	HUM	Call to Clerk re: consent order	.20
01/01/00	HUM	Letter to Brent Wood re: consent judgments	.20
01/07/00	HUM	Review order allowing objection to Acstar claim	.40

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01/10/00	HUM	Work on motion to compel entry of consent judgments	.50
01/11/00	HUM	Finalize Motion to Compel Compliance with Settlement Agreement	1.20
01/20/00	HUM	Conference with Harden re: IHI trademark use by Van Etten	.40
01/21/00	HUM	Review revised consent judgments and call to Brent Wood re: same	.40
01/25/00	HUM	Letter to Holmes Harden re: Consent Judgments from Woods, review Consent Judgments and compare to Settlement Agreement	.50

Fees Billed

-----  
\$ 2,523.00

Disbursements  
-----

Delivery Charge	\$	52.50
Fax	\$	35.00
Copies	\$	79.00
Postage	\$	4.40

Total Disbursements \$ 170.90

-----  
Total Current Bill \$ 2,693.90

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With

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Raleigh

NC 27604

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Amount Paid:

Return Upper Portion With Payment

Balance Due

-----  
\$ 2,693.90

=====

**Fee Summary**

S W Humrickhouse worked 17.40 hours at \$145 an hour.

A finance charge is computed on account balances unpaid 30 days  
after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).



In Account With

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Federal ID #  
56-1201204

08/30/00

Invoice 32638

TO Holmes P. Harden  
c/o Maupin, Taylor & Ellis, PA  
3200 Beechleaf Ct. POB 19764  
Raleigh NC 27604

Client Id. 00-12075

Matter Id. 000-000-001 SH/G - International Heritage, Inc - Chapter 7  
Amount Paid:

Return Upper Portion With Payment

For legal services rendered; including  
but not limited to

02/11/00	HUM	Various discussions with Harden re: trademark action, preference actions, etc., research on corporate dissolution	1.00
07/18/00	HUM	Conf. with Holmes Harden, Conf. with Craig Adams re: preference analysis	.40
07/26/00	HUM	Meeting with Craig Adams re: preference actions (.7); Call to Holmes Harden re: additional documents (.2)	.90
08/05/00	HUM	Conf. with Craig Adams re: preference analysis	.40
08/23/00	HUM	Conference with Craig Adams re: preference analysis documentation.	.40

Fees Billed

-----  
\$ 449.50

Disbursements

-----

Delivery Charge	\$	7.50
Postage	\$	1.10
Copies	\$	6.60

A finance charge is computed on account balances unpaid 30 days after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).

In Account With

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Return Upper Portion With Payment

Total Disbursements	\$ 15.20
Total Current Bill	\$ 464.70
Previous Balance	\$ 2,693.90
Balance Due	\$ 3,158.60

Fee Summary

S W Humrickhouse worked 3.10 hours at \$145 an hour.

A finance charge is computed on account balances unpaid 30 days after the billing date at a periodic rate of 1½% per month (Annual percentage rate of 18%).